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October 20, 2015

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Aleksandr Flit v. Nikolao Stefopoulos et al., 15-CV-3689 (BMC)

Your Honor:

I am attorney for plaintiff in the above referenced case. I write to request that discovery in this matter be extended until November 13, 2015. Defense Counsel consents to this request.

Yesterday afternoon, the parties jointly wrote Your Honor proposing a schedule for expert disclosure and informing Your Honor that the parties anticipate completing discovery by the scheduled deadline of October 30, 2015. Since this submission, plaintiff's counsel has learned that he is unable to take defendants' depositions until the week of November 9, 2015. Accordingly, plaintiff makes the instant application. No other modifications of the parties' proposed schedule is required.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Robert Marinelli